

Whistleblowing Policy (Public Interest Disclosure Act 1998): what to do and who to contact

This policy is included in the Staff Handbook.

The College is committed to the highest standards of honesty and integrity and expects all its staff and members to maintain high standards of conduct. However, as with any organisation, the College faces a risk of things going wrong, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations occurring or to address them when they do occur.

The aims of this policy are:

- To encourage staff and all members of the College to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected
- To provide guidance as to how to raise concerns
- To reassure staff that they should be able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken

Who is covered by the Public Disclosure Act

The whistleblower protection covered by the Public Disclosure Act applies specifically to employees and workers.

The Act does not apply, for example to Fellows and other Senior Members, students or volunteers who are not also employees or workers.

Nevertheless, all members of the College should follow the same procedure outlined below if they need to raise concerns and should be assured that the College will offer them the same protection against detrimental treatment as offered to workers and employees.

Under certain circumstances, you have legal protection if you report suspected wrongdoing or dangers which are not being addressed i.e. you are a 'whistleblower'.

If you believed, for example, that the College was disposing of toxic waste illegally you may have 'blown the whistle' directly to the press or television, perhaps because of concern for the environment, a belief that the organisation would attempt a 'cover-up' if asked to stop, or for financial gain.

This legislation protects you from suffering any detriment or termination of engagement for whistleblowing as long as you are raising a genuine concern, and you follow the procedure set out below.

When an individual makes a disclosure, the College will process any personal data collected in accordance with its data protection policy. Data collected from the point at which you make the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

Qualifying Disclosures

To be protected under this policy your disclosure would need to be a 'qualifying disclosure'. Disclosures are qualifying disclosures where it can be shown that the College is involved in:

- committing a criminal offence
- failing to comply with a legal obligation
- a miscarriage of justice
- endangering the health and safety of an individual
- environmental damage
- financial fraud or mismanagement
- concealing any information relating to the above

Procedure

You should report any concerns to the Whistleblowing Officer, i.e., the Bursar. Alternatively, you may raise concerns with the President or the Chair of Audit and Risk Committee (their contact details are at the end of this policy) - all will treat the matter in complete confidence.

Once you have raised your concern, we will arrange a meeting with you as soon as possible to discuss the issue. You may bring a colleague or union representative to any meetings under this policy.

We will then carry out an initial assessment to determine the scope of the investigation. We will inform you of the outcome of our assessment. In some cases we may appoint an investigator or team of investigators. We will aim to keep you informed of the progress of any investigation and its likely timescale.

The College's Governance Committee (all its members are Governing Body Fellows) will consider the findings of an investigation and determine the subsequent course of action.

External reporting of concerns

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. 'Protect' operates a confidential helpline. Their contact details are at the end of this policy.

Protection of whistleblowers

We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the HR Manager or the Bursar immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action. However, if we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.

'Protect' operates a confidential helpline. Their contact details are given below.

Contacts

Bursar Whistleblowing Officer	Jonathan Newby 01223 334891 bursar@hughes.cam.ac.uk
President	Sir Laurie Bristow president@hughes.cam.ac.uk
Chair of Audit and Risk Committee	Dr Jimmy Chan jc2116@hughes.cam.ac.uk
Protect (Independent whistleblowing charity)	Helpline: (020) 3117 2520 Email via advice line page Website: https://protect-advice.org.uk/